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May 18, 2018

VIA ECF

Honorable Henry Pitman
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Coventry Capital US LLC v. EEA Life Settlements, Inc. et al.*,
No. 17-cv-7417 (VM) (HBP)

Dear Judge Pitman:

We represent Defendant EEA Life Settlements, Inc. ("EEA Inc.") in the above-referenced action. As discussed during the May 11, 2018 case management conference, we are writing to propose a revised case management schedule. To that end, Defendants EEA Inc., Vincent Piscaer ("Piscaer") and Hiren Patel ("Patel") (collectively the "Defendants") and Plaintiff Coventry Capital US LLC ("Coventry") participated in a meet and confer call on May 17, 2018, but were unable to come to a mutually agreeable schedule for the reasons discussed below.

During the May 17 meet and confer, Coventry proposed the following schedule with the caveat that it reserves the right to request further extensions as may be needed:

- Next Case Management Conference held during the week of June 11, 2018
- Requests to Admit to be served no later than August 1, 2018
- Fact Discovery to be completed by not later than September 7, 2018
- Expert reports by the party bearing the burden of proof due by October 12, 2018
- Expert rebuttal reports due by November 9, 2018
- All expert discovery to be completed by December 15, 2018
- Settlement conference to be held by January 15, 2019

While EEA Inc. is amenable to moving this litigation forward as expeditiously as possible, we respectfully submit that Coventry's proposed schedule is overly optimistic given that (1) there is some uncertainty as to how quickly document discovery will be concluded and whether any additional motion practice related thereto may be pursued; and (2) scheduling and conducting depositions in the summer months may well prove to be difficult in light of summer

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May 18, 2018

Page 2

travel and vacation schedules and competing business obligations of counsel over the summer months, some of which has already been disclosed to Coventry. In light of the foregoing, EEA Inc. proposes the following schedule, also recognizing that the parties may need to request further extensions as may be needed:

- Next Case Management Conference held on June 26, 27, or 28, 2018
- Requests to Admit to be served no later than October 15, 2018
- Fact Discovery to be completed by not later than November 15, 2018
- Expert reports by the party bearing the burden of proof due by February 5, 2019
- Expert rebuttal reports due by March 5, 2019
- All expert discovery to be completed by April 5, 2019
- Settlement conference to be held by April 10, 2019

Counsel for the individual defendants, Messrs. Patel and Piscaer, have agreed to EEA Inc.'s proposed schedule.

We appreciate the Court's consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'K. Geercken', is written over a horizontal line.

Karl Geercken

cc: Counsel of Record (via ECF and email)